

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)
_____)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

Suits Naming the Tennessee Clinic)
Defendants)
)

NOTICE OF FILING OF AMENDED DEPOSITION NOTICE

Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Vaughan Allen, MD; Specialty Surgery Center, Crossville, PLLC; Kenneth R. Lister, MD; Kenneth Lister, MD, PC; and Donald E. Jones, MD (collectively "Tennessee Clinic Defendants") give notice to the Court and to all parties of the following:

1. John Notarianni's deposition noticed for September 9, 2015,¹ is hereby postponed but is expected to be rescheduled. Once a deposition date is set, the Tennessee Clinic Defendants will file an amended notice of deposition.

2. Joseph Connolly's deposition noticed for August 25, 2015,² is hereby rescheduled for September 23, 2015. The deposition will begin at 9:00 am (EDT) and will occur at the law offices of Nutter, McClennen & Fish, LLP, Seaport West, 155 Seaport Blvd., Boston, MA 02110. An amended notice of deposition is attached to this notice as Exhibit 1.

¹ The original notice is at Dkt. 1782-4.

² The original notice is at Dkt. 2115-2.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

C.J. Gideon, Jr.*

Chris J. Tardio*

Alan S. Bean**

Matthew H. Cline*

315 Deaderick Street, Suite 1100

Nashville, TN 37238

Ph: (615) 254-0400

Fax: (515) 254-0459

chris@gideoncooper.com

***Attorneys for the Tennessee Clinic
Defendants***

* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 1st day of September, 2015.

/s/ Chris J. Tardio

Chris J. Tardio